



U.S. Department of Justice

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April 1, 2025

By ECF

The Honorable LaShann DeArcy Hall
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Marcus Ricketts, et al.*, Case No. 22-CR-106(LDH)

Dear Judge DeArcy Hall:

I am the Assistant United States Attorney from the District of New Jersey representing the Government as a Special Attorney in this matter, which concerns the treatment provided to Defendant Jonathan Goulbourne while he was confined at the Metropolitan Detention Center Brooklyn ("MDC").¹ I write on behalf of the Government and the Federal Bureau of Prisons ("BOP") to respectfully submit information to Your Honor concerning MDC, which the Government believes is pertinent but not part of the evidentiary record for submission to Your Honor in the findings of fact filed today. *See* ECF Nos. 429, 430.

By way of brief background, on January 13, 2025, the Court held a hearing to better understand what transpired with respect to April 2024 care provided to Mr. Jonathan Goulbourne, then a pre-sentence detainee at MDC. The Court specifically identified the issue of ensuring that an inmate maintains access to self-carry prescription medication upon transfer to the Special Housing Unit ("SHU") at MDC. BOP takes this concern seriously and continuously evaluates its practices and

¹ The United States Attorney's Office for the Eastern District of New York ("USAO-EDNY") previously represented the Government in this matter. On August 20, 2024, the Executive Office of United States Attorneys approved USAO-EDNY's recusal in this matter and assigned it to the United States Attorney's Office for the District of New Jersey. The undersigned, who is now handling this matter, worked as an Assistant United States Attorney at USAO-EDNY from September 2015 to July 2021, but had no involvement in this matter when it was handled by USAO-EDNY.

policies. To that end, BOP wishes to inform the Court that the MDC's pharmacy has implemented a practice of reviewing the list of any new commits to the SHU each day (absent exigent circumstances), and to process a fresh set of a new commit's self-carry medication for distribution to the new commit in the SHU. The BOP is in the process of codifying this practice.

Additionally, "[r]ecognizing the urgent nature of the conditions at MDC Brooklyn," BOP created the "Urgent Action Team" from a group of BOP executives to address "serious concerns" and "achieve lasting change" at MDC. See Brooklyn Urgent Action Team, Fact Sheet as of September 19, 2024, available at: https://www.bop.gov/resources/pdfs/mdc_bro_uat_fact_sheet.pdf?v=1.0.0. The Urgent Action Team is made up of BOP executives with expertise in human resources, facilities, procurement, budget, custody and security, medical care, and technology. BOP takes seriously its obligation to address the challenges at MDC. The Fact Sheet identifies some of the positive changes achieved at MDC by the Urgent Action Team, since the Team's formation.

We appreciate Your Honor's attention to this matter.

Respectfully submitted,

ALINA HABBA
United States Attorney

By: /s/ Matthew J. Mailloux
MATTHEW J. MAILLOUX
Special Attorney
Acting Under Authority
Conferred by 28 U.S.C. § 515

cc: All Counsel of Record (By ECF)